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November 28, 2023

Via ECF and Electronic Mail

Honorable Analisa Torres, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007  
[Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

Re: *Pierce v. Better Holdco, Inc., et al.*  
Case No: 22 CV 04748 (AT)

Dear Judge Torres:

The parties in the above-referenced matter write to Your Honor jointly to request an extension of discovery deadlines. The parties have continued to make progress in discovery. However, as described in the previous letter motions granted by Your Honor, see ECF Nos. 68 and 72, there were Motions to Dismiss that were *sub judice* with the Court that now have, as anticipated, have affected the scope and detail of the discovery required in this matter.

As such, the parties therefore respectfully request that the existing discovery dates be extended by 90 days, as follows:

- Depositions to be completed by March 15, 2024 from December 16, 2023;
- Discovery to be completed by March 29, 2024 from December 30, 2023; and
- Expert discovery to be completed by May 31, 2024 from February 29, 2023.

There have been three prior joint requests for extensions of the discovery deadlines, see ECF Nos. 62, 68, and 72. Each were granted.

The parties thank the Court for its consideration.

Respectfully submitted,  
*Neal Brickman*  
Neal Brickman

cc: All Counsel by ECF on Consent